

1 TASHA ALYSSA HILL, SBN 301865  
2 The Hill Law Firm  
3 5132 York Blvd., #50681  
4 Los Angeles, CA 90042  
5 484-282-3836  
6 [tashahilllaw@gmail.com](mailto:tashahilllaw@gmail.com)

7 MAYA HYLTON GARZA, SBN 334065  
8 Law Office of Maya Hylton Garza  
9 1751 Colorado Blvd, #398  
10 Los Angeles, CA 90041  
11 Tel: 323-366-0551  
12 [maya@hyltongarzalaw.com](mailto:maya@hyltongarzalaw.com)

13 Attorneys for Petitioner

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT

16 LOS ANGELES SUNSHINE  
17 COALITION

18 Petitioner,

19 vs.

20 THE CITY OF LOS ANGELES and  
21 GIL CEDILLO, City Councilmember

22 Respondents.  
23  
24  
25  
26  
27  
28

Case No. 21STCF01920

**Verified Petition for Writ of  
Mandate Ordering Compliance  
with the California Public Records  
Act**

[Government Code §§ 6250 *et seq.*;  
Code of Civil Procedure § 1085]

1 Petitioner Los Angeles Sunshine Coalition, represented by Adrian Riskin, petitions  
2 this Court for a writ of mandate requiring the City of Los Angeles and Los Angeles  
3 City Councilmember Gil Cedillo (collectively, the “Respondents”) to immediately  
4 make available to Petitioner public records lawfully requested by Petitioner  
5 pursuant to the California Public Records Act (“CPRA”), Government Code §  
6 6250, *et seq.* Petitioner also respectfully requests that this Court grant relief in the  
7 form of costs of suit, attorney’s fees, and other appropriate and just relief resulting  
8 from Respondent’s unlawful conduct. Petitioner alleges as follows:

9 **PARTIES**

- 10 1. Petitioner Los Angeles Sunshine Coalition is represented by Dr. Adrian  
11 Riskin. Riskin is a resident of Los Angeles, a professor at a local College,  
12 and an open records activist. Using CPRA requests to investigate and  
13 understand the activities of the Los Angeles City government, Riskin makes  
14 all his findings freely available to the public through blogging and  
15 community events. His collection of records have helped both researchers  
16 and the public at large learn about the city’s response to the homelessness  
17 crisis, including students at U.C. Berkeley School of Law’s Policy Advocacy  
18 Clinic and documentary filmmakers producing a film about the Greater West  
19 Hollywood Food Coalition. Records obtained by Riskin have also been  
20 featured as part of an exhibit at the Los Angeles Poverty Department – Skid  
21 Row History Museum. Moreover, Riskin has also helped to empower the  
22 public by publishing a guide to the practical use of the CPRA in the City of  
23 Los Angeles. Riskin is a member of the public within the meaning of §§  
24 Gov’t Code 6252(b)-(c). Riskin made the relevant public records requests  
25 that are the subject of this writ in his capacity as a representative of the  
26 Sunshine Coalition.
- 27 2. Respondent City of Los Angeles (the “City”) is a local public agency within  
28 the meaning of Gov’t Code §§ 6252(a) and 6252(d). The Los Angeles City

1 Council is a department or division of the City.

- 2 3. Respondent Gil Cedillo is the City Councilmember for the First District. Gil  
3 Cedillo is the public official with the ultimate authority and responsibility  
4 for the acts and omissions complained of herein.

5 **JURISDICTION AND VENUE**

- 6 4. This court has jurisdiction over this petition pursuant to Gov't Code §§ 6258  
7 and 6259 and Code of Civil Procedure § 1085.  
8 5. Venue is proper in this Court. The records in question, or some portion of  
9 them, are situated in the County of Los Angeles. *See* Gov't Code § 6259(a).  
10 Also, Respondents reside in, and the acts and omissions complained of  
11 herein occurred in, the County of Los Angeles. *See* Code Civ. Proc. §§  
12 393(b) & 394(a).

13 **GENERAL ALLEGATIONS**

- 14 6. This dispute arises from the failure of Respondents to comply with multiple  
15 lawful requests for public records.

16 *August 2019 Request*

- 17 7. On August 17, 2019, Petitioner made a records request ("August 2019  
18 Request") to Respondents pursuant to the CPRA. The request asked for all  
19 2018 and 2019 emails which were to/from/cc/bcc gabrielle.taylor@lacity.org  
20 in the possession of Ricardo Flores, City employee and Field Director to  
21 Respondent Cedillo. A true and correct copy of the request is attached as  
22 Exhibit A.  
23 8. All agencies are required to respond within 10 days from the receipt of the  
24 request with a determination of whether the agency possesses responsive  
25 documents. *See* Gov't Code § 6253(c).  
26 9. All agencies are required to make records "promptly available" to a person  
27 upon payment of fees of replication, subject to some exemptions. *See* Gov't  
28 Code § 6253(b).

- 1 10. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
2 Petitioner's August 2019 Request.
- 3 11. On October 19, 2019, Petitioner followed up on the August 2019 Request to  
4 Respondents, 64 days after his initial request. A true and correct copy of the  
5 email is attached as Exhibit B.
- 6 12. In violation of Gov't Code §§ 6253(b)-(c), Respondents again did not  
7 respond to Petitioner's August 2019 Request.
- 8 13. On January 5, 2020, Petitioner followed up on the August 2019 Request for  
9 a second time, 142 days after his initial request. A true and correct copy of  
10 the email is attached as Exhibit C.
- 11 14. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
12 Petitioner's August 2019 Request for a third time.
- 13 15. On February 16, 2020, Petitioner followed up on the August 2019 Request  
14 for a third time, 184 days after his initial request. A true and correct copy of  
15 the email is attached as Exhibit D.
- 16 16. On February 16, 2020, Respondents acknowledged the outstanding August  
17 2019 CPRA request. A true and correct copy of the email is attached as  
18 Exhibit E.
- 19 17. Respondents, however, again failed to make the records promptly available  
20 as required under Gov't Code § 6253(b).
- 21 18. On March 8, 2020, Petitioner followed up on the August 2019 Request for a  
22 fourth time, 205 days after his initial request. A true and correct copy of the  
23 email is attached as Exhibit F.
- 24 19. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
25 Petitioner's August 2019 Request for a fourth time.
- 26 20. On May 20, 2020, Petitioner followed up on the August 2019 Request for a  
27 fifth time, 278 days after his initial request. In light of the continued delay to  
28 respond to his request, he asked for the initial request to be amended such

1 that the time period for the search would be extended to May 20, 2020. A  
2 true and correct copy of the email is attached as Exhibit G.

3 21. On May 20, 2020, Respondent asserted that he had fulfilled the August 2019  
4 Request, but agreed to confirm with the City employee charged with  
5 completing the request. A true and correct copy of the email is attached as  
6 Exhibit H.

7 22. Again, Respondents failed to make the records promptly available as  
8 required under Government Code § 6253(b).

9 23. On November 12, 2020, Petitioner followed up on the August 2019 Request  
10 for a sixth time, 453 days after his initial request. A true and correct copy of  
11 the email is attached as Exhibit I.

12 24. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
13 Petitioner's August 2019 Request for a fifth time.

14 25. Petitioner has not received any further response from Respondents since  
15 May 20, 2020.

16 *February 2020 Request*

17 26. On February 26, 2020, Petitioner made a records request ("February 2020  
18 Request") to Respondents pursuant to the CPRA. The request asked for all  
19 2019 and 2020 emails in the possession of the First Council District's  
20 Unified Homelessness Response Center's employee containing the  
21 following key words or phrases: "190307010", "799 W Riverside", 799  
22 Riverside", "frogtown" and "encampment", "riverside" and "encampment",  
23 "Tallman", or "Ami". A true and correct copy of the request is attached as  
24 Exhibit J.

25 27. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
26 Petitioner's February 2020 Request.

27 28. On May 20, 2020, Petitioner followed up on the February 2020 Request to  
28 Respondents, 84 days after his initial request. A true and correct copy of the

1 email is attached as Exhibit K.

2 29. On May 20, 2020, Respondents responded to Petitioner, asking for  
3 clarification for an acronym used in the request. Petitioner responded with  
4 clarification on May 20, 2020. A true and correct copy of those emails are  
5 attached as Exhibit L.

6 30. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not notify  
7 Petitioner within a 10-day period as to whether Respondents had the  
8 requested records within their possession and did not make any records  
9 "promptly available" to Petitioner.

10 31. On November 12, 2020, Petitioner followed up the February 2020 Request  
11 to Respondents, 260 days after his initial request. A true and correct copy of  
12 the email is attached as Exhibit M.

13 32. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
14 Petitioner's February 2020 Request.

15 33. Petitioner has not received any further response from Respondents since  
16 May 20, 2020.

17 March 2020a Request

18 34. On March 2, 2020, Petitioner made a records request ("March 2020a  
19 Request") to Respondents pursuant to the CPRA. The request asked for all  
20 emails in the possession of City employees Gerald Gubatan and Tony  
21 Ricasa, from January 1, 2017 to the date of the request, which were  
22 to/from/cc/bcc matt.szabo@lacity.org or which contained the term "szabo".  
23 A true and correct copy of the request is attached as Exhibit N.

24 35. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
25 Petitioner's March 2020a Request.

26 36. On May 20, 2020, Petitioner followed up on his initial March 2020a Request  
27 to Respondents, 79 days after his initial request. A true and correct copy of  
28 the email is attached as Exhibit O.

1 37. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
2 Petitioner's March 2020a Request for a second time.

3 38. On November 12, 2020, Petitioner followed up on his March 2020a Request  
4 to Respondent, 255 days after his initial request. A true and correct copy of  
5 the email is attached as Exhibit P.

6 39. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
7 Petitioner's March 2020a Request for a third time.

8 40. At no time did Petitioner receive any response or acknowledgement of the  
9 March 2020a Request from Respondents, in violation of Gov't Code §§  
10 6253(b)-(c).

11 March 2020b Request

12 41. On March 2, 2020, Petitioner made a records request ("March 2020b  
13 Request") to Respondents pursuant to the CPRA. The request was for all  
14 emails in the possession of City employees Gerald Gubatan and Tony  
15 Ricasa, from January 1, 2017 to the date of the request, which were  
16 to/from/cc/bcc from any account at any of the following domains:  
17 "deaztlangroup.com", "psomas.com", or "sheppardmullin.com". A true and  
18 correct copy of the request is attached as Exhibit Q.

19 42. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
20 Petitioner's March 2020b Request.

21 43. On May 20, 2020, Petitioner followed up on his initial March 2020b Request  
22 to Respondents, 79 days after his initial request. A true and correct copy of  
23 the request is attached as Exhibit R.

24 44. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
25 Petitioner's March 2020a Request for a second time.

26 45. On November 12, 2020, Petitioner followed up for a second time on his  
27 March 2020b Request to Respondents, 255 days after his initial request. A  
28 true and correct copy of the request is attached as Exhibit S.

- 1 46. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not respond to  
2 Petitioner's March 2020b Request for a third time.
- 3 47. On December 8, 2020, Petitioner followed up for a third time on his March  
4 2020b Request to Respondents, 281 days after his initial request. A true and  
5 correct copy of the request is attached as Exhibit T.
- 6 48. On December 8, 2020, Respondents responded to the fourth attempt by  
7 Petitioner to get access to the records requested under the March 2020b  
8 Request, acknowledging receipt and stating Respondents would respond to  
9 the request on December 10, 2020, two days later. A true and correct copy of  
10 the email is attached as Exhibit U.
- 11 49. Respondents did not respond on December 10, 2020.
- 12 50. In violation of Gov't Code §§ 6253(b)-(c), Respondents did not notify  
13 Petitioner within a 10-day period as to whether Respondents had the  
14 requested records within their possession and did not make any records  
15 "promptly available" to Petitioner.
- 16 51. On January 25, 2021, Respondents sent an email to Petitioner that was blank  
17 save for Respondents' email signature. A true and correct copy of the email  
18 is attached as Exhibit V.
- 19 52. On January 25, 2021, Petitioner responded to Respondents' email asking for  
20 clarity as he did not understand why he had been contacted. A true and  
21 correct copy of the email is attached as Exhibit W.
- 22 53. Petitioner has not received any further response from Respondents since  
23 January 25, 2021.

24 November 2020 Request

- 25 54. On November 12, 2020, Petitioner made a records request ("November 2020  
26 Request") to Respondents pursuant to the CPRA. The request was for all  
27 emails in the possession of City employee Gerald Gubatan, between August  
28 1, 2020 and November 1, 2020, which met any of the following criteria: (a)



1 were to/from/cc/bcc to any of the following email accounts or domains,  
2 “nussbaumapc.com”, “deaztlangroup.com”, “psomas.com”,  
3 “sandstoneproperties.com”, or (b) which contain any of the following words  
4 or phrases, “Botz”, “Hillside”, “1130”, “eminent domain”. A true and  
5 correct copy of the request is attached as Exhibit X.

6 55. In violation of Gov’t Code §§ 6253(b)-(c), Respondents did not respond to  
7 Petitioner’s November 2020 Request.

8 56. On December 8, 2020, Petitioner followed up on the November 2020  
9 Request, 26 days after his initial request. A true and correct copy of the  
10 email is attached as Exhibit Y.

11 57. In violation of Gov’t Code §§ 6253(b)-(c), Respondents did not respond to  
12 Petitioner’s November 2020 Request for a second time.

13 58. At no time did Petitioner receive any response or acknowledgement of the  
14 November 2020 Request from Respondents, in violation of Gov’t Code §§  
15 6253(b)-(c).

## 16 CAUSE OF ACTION

### 17 For Violations of the California Public Records Act, Gov’t Code § 6250 *et seq.*

18 59. Petitioner realleges and incorporates by reference the preceding paragraphs  
19 in this Petition.

20 60. Pursuant to Gov’t Code § 6258, any persons may “institute proceeding for  
21 injunctive or declaratory relief or writ of mandate in any court of competent  
22 jurisdiction to enforce his or her right to inspect or receive a copy of any  
23 public record or class of public records under this chapter.”

24 61. The records Petitioner seeks are public records, i.e., related to the conduct of  
25 the public’s business.

26 62. Upon information and belief, Petitioner alleges that Respondents prepared,  
27 retained, used, or had control or constructive possession of public records  
28 that are responsive to Petitioner’s request.

63. Petitioner alleges in accordance with Gov't Code § 6259(a) that the information it seeks from Respondents is maintained in Los Angeles County.

64. Respondents' failure to provide responsive public records violates the CPRA.

65. Petitioner requests that this Court issue a writ of mandate compelling Respondents to release the requested records.

### **REQUEST FOR RELIEF**

WHEREFORE, Petitioner respectfully requests judgment as follows:

1. That the Court issue a peremptory writ of mandate directing Respondents to make all requested documents available for inspection and provide a quote for direct costs of duplication of the records within 10 days of this Court's order directing that they do so;
2. That the Court enter an order awarding Petitioner his costs of suit and reasonable attorney's fees and costs incurred in bringing this litigation;
3. For such other relief as this Court deems just and proper.

Dated: June 6, 2021

By Tasha Alyssa Hill  
Tasha Alyssa Hill

By Maya Hylton Garza  
Maya Hylton Garza

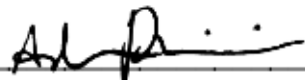
Attorneys for Petitioner

1 **VERIFICATION**

2 I, Adrian Riskin, representative for the Los Angeles Sunshine Coalition, have read  
3 the foregoing Petition for Writ of Mandate and know the contents thereof. The  
4 same is true of my knowledge, except as to those matters alleged on information  
5 and belief, and as to those matters, I also believe them to be true.  
6

7 I declare under penalty of perjury under the laws of California that the foregoing is  
8 true and correct.  
9

10 Executed on JUNE 9, 2021, in Los Angeles, California.

11  
12 By:   
13 Adrian Riskin  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# EXHIBIT A

**Subject:** CPRA request (CD1.2019.08.17.a)  
**From:** adrian@123mail.org  
**Date:** 8/17/19, 8:07 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good morning, Mr. Ilomin.

Today I am looking for all 2018 and 2019 emails in the possession of Mr. Flores which are to/from/cc/bcc [gabrielle.taylor@lacity.org](mailto:gabrielle.taylor@lacity.org).

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Please note that provision of emails in this format is required by the CPRA at section 6253.9. If you all need help in executing the export procedure you might contact Colin Sweeney of CD12, who has prepared a handy instruction sheet for City email users responding to CPRA requests.

Note that MBOX files are structured text and can be redacted without altering the format using find/replace in a text editor (NOT a word processor) to replace actually exempt information with innocuous symbols such as ++++++ or something similar. I also need copies of ALL attachments to these emails in their own native formats. These will automatically be included in the MBOX export.

Thanks for your help, Mr. Ilomin.

Adrian

# EXHIBIT B

**Subject:** Re: CPRA request (CD1.2019.08.17.a)  
**From:** adrian@123mail.org  
**Date:** 10/19/19, 6:54 AM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good morning, Mr. Ilomin.

Please, I implore you, let me know what is going on with this request.

Thanks!

Adrian

On Sat, Aug 17, 2019, at 8:07 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good morning, Mr. Ilomin.

Today I am looking for all 2018 and 2019 emails in the possession of Mr. Flores which are to/from/cc/bcc [gabrielle.taylor@lacity.org](mailto:gabrielle.taylor@lacity.org).

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Please note that provision of emails in this format is required by the CPRA at section 6253.9. If you all need help in executing the export procedure you might contact Colin Sweeney of CD12, who has prepared a handy instruction sheet for City email users responding to CPRA requests.

Note that MBOX files are structured text and can be redacted without altering the format using find/replace in a text editor (NOT a word processor) to replace actually exempt information with innocuous symbols such as ++++++ or something similar. I also need copies of ALL attachments to these emails in their own native formats. These will automatically be included in the MBOX export.

Thanks for your help, Mr. Ilomin.

Adrian

# EXHIBIT C



**Subject:** Pending CPRA requests to Mr. Flores CD1.2019.07.23.a  
CD1.2019.07.23.b CD1.2019.07.23.c CD1.2019.07.23.d CD1.2019.07.24.a  
CD1.2019.07.26.a CD1.2019.08.17.a CD1.2019.08.17.b  
**From:** adrian@123mail.org  
**Date:** 1/5/20, 3:54 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

I'm writing to propose a solution to CD1's ongoing violation of the CPRA with respect to these eight pending requests, none of which you've responded to at all yet. I also attached copies of the requests for reference:

CD1.2019.07.23.a  
CD1.2019.07.23.b  
CD1.2019.07.23.c  
CD1.2019.07.23.d  
CD1.2019.07.24.a  
CD1.2019.07.26.a  
CD1.2019.08.17.a  
CD1.2019.08.17.b

These requests are all to Mr. Flores. They can be easily located in a single search operation if he will just copy/paste the following search string into the search field and set the date range to January 1, 2018 or later:

[tia.strozier@lacity.org](mailto:tia.strozier@lacity.org) OR henderson OR theo OR [geoyu28@aol.com](mailto:geoyu28@aol.com) OR [33059@lapd.online](mailto:33059@lapd.online) OR [36899@lapd.online](mailto:36899@lapd.online) OR [albert.torres@lacity.org](mailto:albert.torres@lacity.org) OR [gail.okazaki@lacity.org](mailto:gail.okazaki@lacity.org) OR [isabella.bolton.torres@lacity.org](mailto:isabella.bolton.torres@lacity.org) OR alpine OR [waylandt2001@yahoo.com](mailto:waylandt2001@yahoo.com) OR wayland OR lausd.net OR castelar OR [gabrielle.taylor@lacity.org](mailto:gabrielle.taylor@lacity.org)

After completing the search Mr. Flores can then follow the directions that CD12 uses to export the results as an MBOX, also attached for reference. Please consider waiving review of this material as a partial mitigation of CD1's egregious CPRA violations with respect to these eight requests. This whole procedure should take no more than a few minutes to run the search and start the MBOX export process. Only Mr. Flores need be involved.

Please do this promptly in order to avoid even more unnecessary and expensive litigation. If you consult with Bethelwel Wilson or someone at the City Attorney about it it might be worth telling them that you want to comply with the law rather than evading compliance it might make a difference in the kind of advice you get. If I don't have the records in hand by February 5 or a firm and mutually acceptable commitment from you as to when you'll produce I will proceed as if CD1 has explicitly denied me access to these records.

Also, I've accepted your inaction on these eight requests and a couple other pending ones I'll be writing to you about soon because, as you may have noticed, I've been busy filing many petitions against other City offices. But I really need information from CD1 and need to submit a number of new requests, so that it is absolutely essential that we establish a compliant and mutually agreeable workflow for future requests. Please find it in your heart to meet and confer with me about how to do this going forward. I am happy to meet with any number of CD1 staff, City Attorney staff, whoever, but I must and will find a way

to get the records flowing.

Thanks for your consideration,

Adrian

---

— Attachments: —

20190723-1936-CPRA_request__CD1_2019_07_23_a_-_Mel_llomin_.pdf	35.4 KB
20190723-2105-CPRA_request__CD1_2019_07_23_b_-_Mel_llomin_.pdf	35.3 KB
20190723-2106-CPRA_request__CD1_2019_07_23_c_-_Mel_llomin_.pdf	35.4 KB
20190723-2207-CPRA_request__CD1_2019_07_23_d_-_Mel_llomin_.pdf	34.8 KB
20190724-2113-CPRA_request__CD1_2019_07_24_a_-_Mel_llomin_.pdf	34.9 KB
20190726-1330-CPRA_request__CD1_2019_07_26_a_-_Mel_llomin_.pdf	34.8 KB
20190817-2007-CPRA_request__CD1_2019_08_17_a_-_Mel_llomin_.pdf	35.0 KB
20190817-2015-CPRA_request__CD1_2019_08_17_b_-_Mel_llomin_.pdf	35.2 KB
CD12_instructions_on_how_to_export_mbox_from_gmail.pdf	130 KB

# EXHIBIT D

**Subject:** Re: Pending CPRA requests to Mr. Flores CD1.2019.07.23.a  
CD1.2019.07.23.b CD1.2019.07.23.c CD1.2019.07.23.d CD1.2019.07.24.a  
CD1.2019.07.26.a CD1.2019.08.17.a CD1.2019.08.17.b

**From:** adrian@123mail.org

**Date:** 2/16/20, 9:26 AM

**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

good morning, Mel.

It appears that only the two from August are still to do here. Is that correct? Do you have an idea about when you might be able to produce?

Thanks,

Adrian.

On Sun, Jan 5, 2020, at 3:54 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

I'm writing to propose a solution to CD1's ongoing violation of the CPRA with respect to these eight pending requests, none of which you've responded to at all yet. I also attached copies of the requests for reference:

CD1.2019.07.23.a  
CD1.2019.07.23.b  
CD1.2019.07.23.c  
CD1.2019.07.23.d  
CD1.2019.07.24.a  
CD1.2019.07.26.a  
CD1.2019.08.17.a  
CD1.2019.08.17.b

These requests are all to Mr. Flores. They can be easily located in a single search operation if he will just copy/paste the following search string into the search field and set the date range to January 1, 2018 or later:

[tia.strozier@lacity.org](mailto:tia.strozier@lacity.org) OR henderson OR theo OR [geoyu28@aol.com](mailto:geoyu28@aol.com) OR [33059@lapd.online](mailto:33059@lapd.online) OR [36899@lapd.online](mailto:36899@lapd.online) OR [albert.torres@lacity.org](mailto:albert.torres@lacity.org) OR [gail.okazaki@lacity.org](mailto:gail.okazaki@lacity.org) OR [isabella.bolton.torres@lacity.org](mailto:isabella.bolton.torres@lacity.org) OR alpine OR [waylandt2001@yahoo.com](mailto:waylandt2001@yahoo.com) OR wayland OR lausd.net OR castelar OR [gabrielle.taylor@lacity.org](mailto:gabrielle.taylor@lacity.org)

After completing the search Mr. Flores can then follow the directions that CD12 uses to export the results as an MBOX, also attached for reference. Please consider waiving review of this material as a partial mitigation of CD1's egregious CPRA violations with respect to these eight requests. This whole procedure should take no more than a few minutes to run the search and start the MBOX export process. Only Mr. Flores need be involved.

Please do this promptly in order to avoid even more unnecessary and expensive litigation. If you consult with Bethelwel Wilson or someone at the City Attorney about it it might be worth telling them that you want to comply with the law rather than evading compliance it might make a difference in the kind of advice you get. If I don't have the records in hand by February 5 or a firm and mutually acceptable commitment from you as to when you'll produce I will proceed as if CD1 has explicitly denied me access to these records.

Also, I've accepted your inaction on these eight requests and a couple other pending ones I'll be writing to you about soon because, as you may have noticed, I've been busy filing many petitions against other City offices. But I really need information from CD1 and need to submit a number of new requests, so that it is absolutely essential that we establish a compliant and mutually agreeable workflow for future requests. Please find it in your heart to meet and confer with me about how to do this going forward. I am happy to meet with any number of CD1 staff, City Attorney staff, whoever, but I must and will find a way to get the records flowing.

Thanks for your consideration,

Adrian

Attachments:

- \* 20190723-1936-CPRA\_request\_CD1\_2019\_07\_23\_a - Mel Ilomin.pdf
- \* 20190723-2105-CPRA\_request\_CD1\_2019\_07\_23\_b - Mel Ilomin.pdf
- \* 20190723-2106-CPRA\_request\_CD1\_2019\_07\_23\_c - Mel Ilomin.pdf
- \* 20190723-2207-CPRA\_request\_CD1\_2019\_07\_23\_d - Mel Ilomin.pdf
- \* 20190724-2113-CPRA\_request\_CD1\_2019\_07\_24\_a - Mel Ilomin.pdf
- \* 20190726-1330-CPRA\_request\_CD1\_2019\_07\_26\_a - Mel Ilomin.pdf
- \* 20190817-2007-CPRA\_request\_CD1\_2019\_08\_17\_a - Mel Ilomin.pdf
- \* 20190817-2015-CPRA\_request\_CD1\_2019\_08\_17\_b - Mel Ilomin.pdf
- \* CD12\_instructions\_on\_how\_to\_export\_mbox\_from\_gmail.pdf

# EXHIBIT E

**Subject:** Re: Pending CPRA requests to Mr. Flores CD1.2019.07.23.a  
CD1.2019.07.23.b CD1.2019.07.23.c CD1.2019.07.23.d CD1.2019.07.24.a  
CD1.2019.07.26.a CD1.2019.08.17.a CD1.2019.08.17.b  
**From:** Mel Ilomin <mel.ilomin@lacity.org>  
**Date:** 2/16/20, 10:49 AM  
**To:** adrian@123mail.org

Yes you are correct. Ricardo told me he still has both pending. I will check with him and let you know.

On Sun, Feb 16, 2020 at 9:27 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

good morning, Mel.

It appears that only the two from August are still to do here. Is that correct? Do you have an idea about when you might be able to produce?

Thanks,

Adrian.

On Sun, Jan 5, 2020, at 3:54 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> Good afternoon, Mel.

>

> I'm writing to propose a solution to CD1's ongoing violation of the  
> CPRA with respect to these eight pending requests, none of which  
you've

> responded to at all yet. I also attached copies of the requests for  
> reference:

>

> CD1.2019.07.23.a

> CD1.2019.07.23.b

> CD1.2019.07.23.c

> CD1.2019.07.23.d

> CD1.2019.07.24.a

> CD1.2019.07.26.a

> CD1.2019.08.17.a

> CD1.2019.08.17.b

>

> These requests are all to Mr. Flores. They can be easily located in a  
> single search operation if he will just copy/paste the following search  
> string into the search field and set the date range to January 1, 2018

> or later:  
>  
> [tia.strozier@lacity.org](mailto:tia.strozier@lacity.org) OR henderson OR theo OR [geoyu28@aol.com](mailto:geoyu28@aol.com)  
OR  
> 33059@lapd.online OR 36899@lapd.online OR  
[albert.torres@lacity.org](mailto:albert.torres@lacity.org) OR  
> [gail.okazaki@lacity.org](mailto:gail.okazaki@lacity.org) OR [isabella.bolton.torres@lacity.org](mailto:isabella.bolton.torres@lacity.org) OR alpine  
> OR [waylandt2001@yahoo.com](mailto:waylandt2001@yahoo.com) OR wayland OR [lausd.net](http://lausd.net) OR castelar  
OR  
> [gabrielle.taylor@lacity.org](mailto:gabrielle.taylor@lacity.org)  
>  
> After completing the search Mr. Flores can then follow the directions  
> that CD12 uses to export the results as an MBOX, also attached for  
> reference. Please consider waiving review of this material as a  
> partial mitigation of CD1's egregious CPRA violations with respect to  
> these eight requests. This whole procedure should take no more than  
a  
> few minutes to run the search and start the MBOX export process.  
Only  
> Mr. Flores need be involved.  
>  
> Please do this promptly in order to avoid even more unnecessary  
and  
> expensive litigation. If you consult with Bethelwel Wilson or someone  
> at the City Attorney about it it might be worth telling them that you  
> want to comply with the law rather than evading compliance it might  
> make a difference in the kind of advice you get. If I don't have the  
> records in hand by February 5 or a firm and mutually acceptable  
> commitment from you as to when you'll produce I will proceed as if  
CD1  
> has explicitly denied me access to these records.  
>  
> Also, I've accepted your inaction on these eight requests and a  
couple  
> other pending ones I'll be writing to you about soon because, as you  
> may have noticed, I've been busy filing many petitions against other  
> City offices. But I really need information from CD1 and need to  
submit  
> a number of new requests, so that it is absolutely essential that we  
> establish a compliant and mutually agreeable workflow for future  
> requests. Please find it in your heart to meet and confer with me  
about  
> how to do this going forward. I am happy to meet with any number  
of CD1



> staff, City Attorney staff, whoever, but I must and will find a way to  
> get the records flowing.  
>  
> Thanks for your consideration,  
>  
> Adrian  
>  
>  
>  
>  
>  
> Attachments:  
> \* 20190723-1936-CPRA\_request\_CD1\_2019\_07\_23\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190723-2105-CPRA\_request\_CD1\_2019\_07\_23\_b\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190723-2106-CPRA\_request\_CD1\_2019\_07\_23\_c\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190723-2207-CPRA\_request\_CD1\_2019\_07\_23\_d\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190724-2113-CPRA\_request\_CD1\_2019\_07\_24\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190726-1330-CPRA\_request\_CD1\_2019\_07\_26\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190817-2007-CPRA\_request\_CD1\_2019\_08\_17\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190817-2015-CPRA\_request\_CD1\_2019\_08\_17\_b\_-  
\_Mel\_Ilomin\_.pdf  
> \* CD12\_instructions\_on\_how\_to\_export\_mbox\_from\_gmail.pdf

--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



# EXHIBIT F

**Subject:** Re: Pending CPRA requests to Mr. Flores (CD1.2019.08.17.a)  
**From:** adrian@123mail.org  
**Date:** 3/8/20, 2:32 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

Just checking on (CD1.2019.08.17.a), which is still pending. Please advise.

A.

On Sun, Feb 16, 2020, at 10:49 AM, Mel Ilomin wrote:

Yes you are correct. Ricardo told me he still has both pending. I will check with him and let you know.

On Sun, Feb 16, 2020 at 9:27 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

good morning, Mel.

It appears that only the two from August are still to do here. Is that correct? Do you have an idea about when you might be able to produce?

Thanks,

Adrian.

On Sun, Jan 5, 2020, at 3:54 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> Good afternoon, Mel.

>

> I'm writing to propose a solution to CD1's ongoing violation of the  
> CPRA with respect to these eight pending requests, none of which  
you've

> responded to at all yet. I also attached copies of the requests for  
> reference:

>

> CD1.2019.07.23.a

> CD1.2019.07.23.b

> CD1.2019.07.23.c

> CD1.2019.07.23.d

> CD1.2019.07.24.a

> CD1.2019.07.26.a

> CD1.2019.08.17.a

> CD1.2019.08.17.b  
>  
> These requests are all to Mr. Flores. They can be easily located in  
a  
> single search operation if he will just copy/paste the following  
search  
> string into the search field and set the date range to January 1,  
2018  
> or later:  
>  
> [tia.strozier@lacity.org](mailto:tia.strozier@lacity.org) OR henderson OR theo OR  
[geoyu28@aol.com](mailto:geoyu28@aol.com) OR  
> 33059@lapd.online OR 36899@lapd.online OR  
[albert.torres@lacity.org](mailto:albert.torres@lacity.org) OR  
> [gail.okazaki@lacity.org](mailto:gail.okazaki@lacity.org) OR [isabella.bolton.torres@lacity.org](mailto:isabella.bolton.torres@lacity.org) OR  
alpine  
> OR [waylandt2001@yahoo.com](mailto:waylandt2001@yahoo.com) OR wayland OR [lausd.net](http://lausd.net) OR  
castelar OR  
> [gabrielle.taylor@lacity.org](mailto:gabrielle.taylor@lacity.org)  
>  
> After completing the search Mr. Flores can then follow the  
directions  
> that CD12 uses to export the results as an MBOX, also attached  
for  
> reference. Please consider waiving review of this material as a  
> partial mitigation of CD1's egregious CPRA violations with respect  
to  
> these eight requests. This whole procedure should take no more  
than a  
> few minutes to run the search and start the MBOX export process.  
Only  
> Mr. Flores need be involved.  
>  
> Please do this promptly in order to avoid even more unnecessary  
and  
> expensive litigation. If you consult with Bethelwel Wilson or  
someone  
> at the City Attorney about it it might be worth telling them that  
you  
> want to comply with the law rather than evading compliance it  
might  
> make a difference in the kind of advice you get. If I don't have the  
> records in hand by February 5 or a firm and mutually acceptable  
> commitment from you as to when you'll produce I will proceed as

if CD1

> has explicitly denied me access to these records.

>

> Also, I've accepted your inaction on these eight requests and a couple

> other pending ones I'll be writing to you about soon because, as you

> may have noticed, I've been busy filing many petitions against other

> City offices. But I really need information from CD1 and need to submit

> a number of new requests, so that it is absolutely essential that we

> establish a compliant and mutually agreeable workflow for future

> requests. Please find it in your heart to meet and confer with me about

> how to do this going forward. I am happy to meet with any number of CD1

> staff, City Attorney staff, whoever, but I must and will find a way to

> get the records flowing.

>

> Thanks for your consideration,

>

> Adrian

>

>

>

>

>

> Attachments:

> \* 20190723-1936-CPRA\_request\_\_CD1\_2019\_07\_23\_a\_-\_Mel\_Ilomin\_.pdf

> \* 20190723-2105-CPRA\_request\_\_CD1\_2019\_07\_23\_b\_-\_Mel\_Ilomin\_.pdf

> \* 20190723-2106-CPRA\_request\_\_CD1\_2019\_07\_23\_c\_-\_Mel\_Ilomin\_.pdf

> \* 20190723-2207-CPRA\_request\_\_CD1\_2019\_07\_23\_d\_-\_Mel\_Ilomin\_.pdf

> \* 20190724-2113-CPRA\_request\_\_CD1\_2019\_07\_24\_a\_-\_Mel\_Ilomin\_.pdf

> \* 20190726-1330-CPRA\_request\_\_CD1\_2019\_07\_26\_a\_-\_Mel\_Ilomin\_.pdf

> \* 20190817-2007-CPRA\_request\_\_CD1\_2019\_08\_17\_a\_-

\_Mel\_Ilomin\_.pdf

> \* 20190817-2015-CPRA\_request\_\_CD1\_2019\_08\_17\_b\_-

\_Mel\_Ilomin\_.pdf

> \* CD12\_instructions\_on\_how\_to\_export\_mbox\_from\_gmail.pdf

--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



# EXHIBIT G

**Subject:** Re: Pending CPRA requests to Mr. Flores (CD1.2019.08.17.a)  
**From:** adrian@123mail.org  
**Date:** 5/20/20, 1:02 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

This is almost a year old at this point. I haven't filed a suit against the City recently but this is rising to the top of the list. Please advise. Also since no one has even started working on this clearly, please provide emails through today rather than through whatever the previous cutoff was.

Thanks,

A.

On Sun, Mar 8, 2020, at 2:32 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

Just checking on (CD1.2019.08.17.a), which is still pending. Please advise.

A.

On Sun, Feb 16, 2020, at 10:49 AM, Mel Ilomin wrote:

Yes you are correct. Ricardo told me he still has both pending. I will check with him and let you know.

On Sun, Feb 16, 2020 at 9:27 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

good morning, Mel.

It appears that only the two from August are still to do here. Is that correct? Do you have an idea about when you might be able to produce?

Thanks,

Adrian.

On Sun, Jan 5, 2020, at 3:54 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> Good afternoon, Mel.

>



> I'm writing to propose a solution to CD1's ongoing violation of the  
> CPRA with respect to these eight pending requests, none of which you've  
> responded to at all yet. I also attached copies of the requests for  
> reference:  
>  
> CD1.2019.07.23.a  
> CD1.2019.07.23.b  
> CD1.2019.07.23.c  
> CD1.2019.07.23.d  
> CD1.2019.07.24.a  
> CD1.2019.07.26.a  
> CD1.2019.08.17.a  
> CD1.2019.08.17.b  
>  
> These requests are all to Mr. Flores. They can be easily located in a  
> single search operation if he will just copy/paste the following search  
> string into the search field and set the date range to January 1, 2018  
> or later:  
>  
> [tia.strozier@lacity.org](mailto:tia.strozier@lacity.org) OR henderson OR theo OR  
[geoyu28@aol.com](mailto:geoyu28@aol.com) OR  
> 33059@lapd.online OR 36899@lapd.online OR  
[albert.torres@lacity.org](mailto:albert.torres@lacity.org) OR  
> [gail.okazaki@lacity.org](mailto:gail.okazaki@lacity.org) OR [isabella.bolton.torres@lacity.org](mailto:isabella.bolton.torres@lacity.org) OR  
alpine  
> OR [waylandt2001@yahoo.com](mailto:waylandt2001@yahoo.com) OR wayland OR [lausd.net](http://lausd.net) OR  
castelar OR  
> [gabrielle.taylor@lacity.org](mailto:gabrielle.taylor@lacity.org)  
>  
> After completing the search Mr. Flores can then follow the directions  
> that CD12 uses to export the results as an MBOX, also attached for  
> reference. Please consider waiving review of this material as a  
> partial mitigation of CD1's egregious CPRA violations with respect to  
> these eight requests. This whole procedure should take no more than a

> few minutes to run the search and start the MBOX export process. Only  
> Mr. Flores need be involved.  
>  
> Please do this promptly in order to avoid even more unnecessary and  
> expensive litigation. If you consult with Bethelwel Wilson or someone  
> at the City Attorney about it it might be worth telling them that you  
> want to comply with the law rather than evading compliance it might  
> make a difference in the kind of advice you get. If I don't have the  
> records in hand by February 5 or a firm and mutually acceptable  
> commitment from you as to when you'll produce I will proceed as if CD1  
> has explicitly denied me access to these records.  
>  
> Also, I've accepted your inaction on these eight requests and a couple  
> other pending ones I'll be writing to you about soon because, as you  
> may have noticed, I've been busy filing many petitions against other  
> City offices. But I really need information from CD1 and need to submit  
> a number of new requests, so that it is absolutely essential that we  
> establish a compliant and mutually agreeable workflow for future  
> requests. Please find it in your heart to meet and confer with me about  
> how to do this going forward. I am happy to meet with any number of CD1  
> staff, City Attorney staff, whoever, but I must and will find a way to  
> get the records flowing.  
>  
> Thanks for your consideration,  
>  
> Adrian  
>

>  
>  
>  
>  
> Attachments:  
> \* 20190723-1936-CPRA\_request\_\_CD1\_2019\_07\_23\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190723-2105-CPRA\_request\_\_CD1\_2019\_07\_23\_b\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190723-2106-CPRA\_request\_\_CD1\_2019\_07\_23\_c\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190723-2207-CPRA\_request\_\_CD1\_2019\_07\_23\_d\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190724-2113-CPRA\_request\_\_CD1\_2019\_07\_24\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190726-1330-CPRA\_request\_\_CD1\_2019\_07\_26\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190817-2007-CPRA\_request\_\_CD1\_2019\_08\_17\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190817-2015-CPRA\_request\_\_CD1\_2019\_08\_17\_b\_-  
\_Mel\_Ilomin\_.pdf  
> \* CD12\_instructions\_on\_how\_to\_export\_mbox\_from\_gmail.pdf

--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



# EXHIBIT H

**Subject:** Re: Pending CPRA requests to Mr. Flores (CD1.2019.08.17.a)  
**From:** Mel Ilomin <mel.ilomin@lacity.org>  
**Date:** 5/20/20, 2:01 PM  
**To:** adrian@123mail.org

I recall having fulfilled all of these since it all dealt with Ricardo. I have contacted Ricardo to check his files.

On Wed, May 20, 2020 at 1:02 PM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Good afternoon, Mel.

This is almost a year old at this point. I haven't filed a suit against the City recently but this is rising to the top of the list. Please advise. Also since no one has even started working on this clearly, please provide emails through today rather than through whatever the previous cutoff was.

Thanks,

A.

On Sun, Mar 8, 2020, at 2:32 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

Just checking on (CD1.2019.08.17.a), which is still pending. Please advise.

A.

On Sun, Feb 16, 2020, at 10:49 AM, Mel Ilomin wrote:

Yes you are correct. Ricardo told me he still has both pending. I will check with him and let you know.

On Sun, Feb 16, 2020 at 9:27 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

good morning, Mel.

It appears that only the two from August are still to do here. Is that correct? Do you have an idea about when you might be able to produce?

Thanks,

Adrian.

On Sun, Jan 5, 2020, at 3:54 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> Good afternoon, Mel.

>

> I'm writing to propose a solution to CD1's ongoing violation of the

> CPRA with respect to these eight pending requests, none of which you've

> responded to at all yet. I also attached copies of the requests for

> reference:

>

> CD1.2019.07.23.a

> CD1.2019.07.23.b

> CD1.2019.07.23.c

> CD1.2019.07.23.d

> CD1.2019.07.24.a

> CD1.2019.07.26.a

> CD1.2019.08.17.a

> CD1.2019.08.17.b

>

> These requests are all to Mr. Flores. They can be easily located in a

> single search operation if he will just copy/paste the following search

> string into the search field and set the date range to January 1, 2018

> or later:

>

> [tia.strozier@lacity.org](mailto:tia.strozier@lacity.org) OR henderson OR theo OR [geoyu28@aol.com](mailto:geoyu28@aol.com) OR

> 33059@lapd.online OR 36899@lapd.online OR [albert.torres@lacity.org](mailto:albert.torres@lacity.org) OR

> [gail.okazaki@lacity.org](mailto:gail.okazaki@lacity.org) OR

> [isabella.bolton.torres@lacity.org](mailto:isabella.bolton.torres@lacity.org) OR alpine

> OR [waylandt2001@yahoo.com](mailto:waylandt2001@yahoo.com) OR wayland OR [lausd.net](http://lausd.net) OR castelar OR

> [gabrielle.taylor@lacity.org](mailto:gabrielle.taylor@lacity.org)

>

> After completing the search Mr. Flores can then follow

the directions

- > that CD12 uses to export the results as an MBOX, also attached for

- > reference. Please consider waiving review of this material as a

- > partial mitigation of CD1's egregious CPRA violations with respect to

- > these eight requests. This whole procedure should take no more than a

- > few minutes to run the search and start the MBOX export process. Only

- > Mr. Flores need be involved.

- >

- > Please do this promptly in order to avoid even more unnecessary and

- > expensive litigation. If you consult with Bethelwel Wilson or someone

- > at the City Attorney about it it might be worth telling them that you

- > want to comply with the law rather than evading compliance it might

- > make a difference in the kind of advice you get. If I don't have the

- > records in hand by February 5 or a firm and mutually acceptable

- > commitment from you as to when you'll produce I will proceed as if CD1

- > has explicitly denied me access to these records.

- >

- > Also, I've accepted your inaction on these eight requests and a couple

- > other pending ones I'll be writing to you about soon because, as you

- > may have noticed, I've been busy filing many petitions against other

- > City offices. But I really need information from CD1 and need to submit

- > a number of new requests, so that it is absolutely essential that we

- > establish a compliant and mutually agreeable workflow for future

- > requests. Please find it in your heart to meet and confer with me about

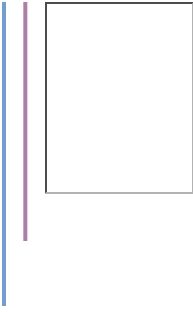
- > how to do this going forward. I am happy to meet

with any number of CD1  
> staff, City Attorney staff, whoever, but I must and will  
find a way to  
> get the records flowing.  
>  
> Thanks for your consideration,  
>  
> Adrian  
>  
>  
>  
>  
>  
> Attachments:  
> \* 20190723-1936-  
CPRA\_request\_CD1\_2019\_07\_23\_a\_-\_Mel\_Ilomin\_.pdf  
> \* 20190723-2105-  
CPRA\_request\_CD1\_2019\_07\_23\_b\_-\_Mel\_Ilomin\_.pdf  
> \* 20190723-2106-  
CPRA\_request\_CD1\_2019\_07\_23\_c\_-\_Mel\_Ilomin\_.pdf  
> \* 20190723-2207-  
CPRA\_request\_CD1\_2019\_07\_23\_d\_-\_Mel\_Ilomin\_.pdf  
> \* 20190724-2113-  
CPRA\_request\_CD1\_2019\_07\_24\_a\_-\_Mel\_Ilomin\_.pdf  
> \* 20190726-1330-  
CPRA\_request\_CD1\_2019\_07\_26\_a\_-\_Mel\_Ilomin\_.pdf  
> \* 20190817-2007-  
CPRA\_request\_CD1\_2019\_08\_17\_a\_-\_Mel\_Ilomin\_.pdf  
> \* 20190817-2015-  
CPRA\_request\_CD1\_2019\_08\_17\_b\_-\_Mel\_Ilomin\_.pdf  
> \*  
CD12\_instructions\_on\_how\_to\_export\_mbox\_from\_gmail.pdf

--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**





--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



# EXHIBIT I

**Subject:** Re: Pending CPRA requests to Mr. Flores (CD1.2019.08.17.a)  
**From:** adrian@123mail.org  
**Date:** 11/12/20, 3:49 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

This is over 1.25 years old at this point and you've produced nothing at all. You never even responded appropriately. Please amend to include 2020 emails and get the material to me as soon as possible. I've attached a copy of the original request for reference.

A.

On Wed, May 20, 2020, at 2:22 PM, Mel Ilomin wrote:

Adrian we are definitely not admitting to incompetence or confusion. So hold your horses on citing the appellate case. I recall having submitted what's pending after I sent that email.

It's not like there were not instances when you yourself made the mistake of thinking we have not produced when we did.

On Wed, May 20, 2020 at 2:09 PM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

You told me in February that it was still pending. When do you think you finished it? You guys have to find a way to keep track of these requests. Did you know there's actually an appellate case stating explicitly that a public agency's incompetence or confusion is not a valid reason for noncompliance with the CPRA?

A.

On Wed, May 20, 2020, at 2:01 PM, Mel Ilomin wrote:

I recall having fulfilled all of these since it all dealt with Ricardo. I have contacted Ricardo to check his files.

On Wed, May 20, 2020 at 1:02 PM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Good afternoon, Mel.

This is almost a year old at this point. I haven't filed a suit against the City recently but this is rising to the top of the list. Please advise. Also since no one has even started working on this clearly, please provide emails through today rather than through whatever the previous cutoff was.

Thanks,

A.

On Sun, Mar 8, 2020, at 2:32 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

Just checking on (CD1.2019.08.17.a), which is still pending. Please advise.

A.

On Sun, Feb 16, 2020, at 10:49 AM, Mel Ilomin wrote:

Yes you are correct. Ricardo told me he still has both pending. I will check with him and let you know.

On Sun, Feb 16, 2020 at 9:27 AM  
<[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

good morning, Mel.

It appears that only the two from August are still to do here. Is that correct? Do you have an idea about when you might be able to produce?

Thanks,

Adrian.

On Sun, Jan 5, 2020, at 3:54 PM,  
[adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> Good afternoon, Mel.

>

> I'm writing to propose a solution to  
CD1's ongoing violation of the  
> CPRA with respect to these eight  
pending requests, none of which you've  
> responded to at all yet. I also attached  
copies of the requests for  
> reference:  
>  
> CD1.2019.07.23.a  
> CD1.2019.07.23.b  
> CD1.2019.07.23.c  
> CD1.2019.07.23.d  
> CD1.2019.07.24.a  
> CD1.2019.07.26.a  
> CD1.2019.08.17.a  
> CD1.2019.08.17.b  
>  
> These requests are all to Mr. Flores.  
They can be easily located in a  
> single search operation if he will just  
copy/paste the following search  
> string into the search field and set the  
date range to January 1, 2018  
> or later:  
>  
> [tia.strozier@lacity.org](mailto:tia.strozier@lacity.org) OR henderson  
OR theo OR [geoyu28@aol.com](mailto:geoyu28@aol.com) OR  
> 33059@lapd.online OR  
36899@lapd.online OR  
[albert.torres@lacity.org](mailto:albert.torres@lacity.org) OR  
> [gail.okazaki@lacity.org](mailto:gail.okazaki@lacity.org) OR  
[isabella.bolton.torres@lacity.org](mailto:isabella.bolton.torres@lacity.org) OR  
alpine  
> OR [waylandt2001@yahoo.com](mailto:waylandt2001@yahoo.com) OR  
wayland OR [lausd.net](http://lausd.net) OR castelar OR  
> [gabrielle.taylor@lacity.org](mailto:gabrielle.taylor@lacity.org)  
>  
> After completing the search Mr. Flores  
can then follow the directions  
> that CD12 uses to export the results  
as an MBOX, also attached for  
> reference. Please consider waiving  
review of this material as a  
> partial mitigation of CD1's egregious

CPRA violations with respect to  
> these eight requests. This whole  
procedure should take no more than a  
> few minutes to run the search and  
start the MBOX export process. Only  
> Mr. Flores need be involved.  
>  
> Please do this promptly in order to  
avoid even more unnecessary and  
> expensive litigation. If you consult  
with Bethelwel Wilson or someone  
> at the City Attorney about it it might  
be worth telling them that you  
> want to comply with the law rather  
than evading compliance it might  
> make a difference in the kind of  
advice you get. If I don't have the  
> records in hand by February 5 or a  
firm and mutually acceptable  
> commitment from you as to when  
you'll produce I will proceed as if CD1  
> has explicitly denied me access to  
these records.  
>  
> Also, I've accepted your inaction on  
these eight requests and a couple  
> other pending ones I'll be writing to  
you about soon because, as you  
> may have noticed, I've been busy  
filing many petitions against other  
> City offices. But I really need  
information from CD1 and need to  
submit  
> a number of new requests, so that it is  
absolutely essential that we  
> establish a compliant and mutually  
agreeable workflow for future  
> requests. Please find it in your heart  
to meet and confer with me about  
> how to do this going forward. I am  
happy to meet with any number of CD1  
> staff, City Attorney staff, whoever, but  
I must and will find a way to  
> get the records flowing.

>  
> Thanks for your consideration,  
>  
> Adrian  
>  
>  
>  
>  
>  
> Attachments:  
> \* 20190723-1936-  
CPRA\_request\_CD1\_2019\_07\_23\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190723-2105-  
CPRA\_request\_CD1\_2019\_07\_23\_b\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190723-2106-  
CPRA\_request\_CD1\_2019\_07\_23\_c\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190723-2207-  
CPRA\_request\_CD1\_2019\_07\_23\_d\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190724-2113-  
CPRA\_request\_CD1\_2019\_07\_24\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190726-1330-  
CPRA\_request\_CD1\_2019\_07\_26\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190817-2007-  
CPRA\_request\_CD1\_2019\_08\_17\_a\_-  
\_Mel\_Ilomin\_.pdf  
> \* 20190817-2015-  
CPRA\_request\_CD1\_2019\_08\_17\_b\_-  
\_Mel\_Ilomin\_.pdf  
> \*  
CD12\_instructions\_on\_how\_to\_export\_mbox\_from\_gmail.pdf

--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



---

— CPRA request (CD1.2019.08.17.a).eml —

**Subject:** CPRA request (CD1.2019.08.17.a)  
**From:** adrian@123mail.org



**Date:** 8/17/19, 8:07 PM

**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good morning, Mr. Ilomin.

Today I am looking for all 2018 and 2019 emails in the possession of Mr. Flores which are to/from/cc/bcc [gabrielle.taylor@lacity.org](mailto:gabrielle.taylor@lacity.org).

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Please note that provision of emails in this format is required by the CPRA at section 6253.9. If you all need help in executing the export procedure you might contact Colin Sweeney of CD12, who has prepared a handy instruction sheet for City email users responding to CPRA requests.

Note that MBOX files are structured text and can be redacted without altering the format using find/replace in a text editor (NOT a word processor) to replace actually exempt information with innocuous symbols such as ++++++ or something similar. I also need copies of ALL attachments to these emails in their own native formats. These will automatically be included in the MBOX export.

Thanks for your help, Mr. Ilomin.

Adrian

— Attachments: —

---

CPRA request (CD1.2019.08.17.a).eml

1.3 KB

# EXHIBIT J

**Subject:** CPRA request (CD1.2020.02.26.a)  
**From:** adrian@123mail.org  
**Date:** 2/26/20, 6:59 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good evening, Mel.

I'm looking for 2019 and 2020 emails in the possession of CD1's UHRC contact, sorry I don't know their name), that have any of the following key words, phrases, or combinations as indicated:

1. 190307010
2. 799 W Riverside
3. 799 Riverside
4. frogtown AND encampment
5. riverside AND encampment
6. Tallman
7. Ami

As always I need these in EML or MBOX format along with all attachments in their native formats.

Thanks,

Adrian

# EXHIBIT K

**Subject:** Re: CPRA request (CD1.2020.02.26.a)  
**From:** adrian@123mail.org  
**Date:** 5/20/20, 1:00 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

You haven't responded yet to this although a response was due like three months ago.

Thanks,

A.

On Wed, Feb 26, 2020, at 6:59 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good evening, Mel.

I'm looking for 2019 and 2020 emails in the possession of CD1's UHRC contact, sorry I don't know their name), that have any of the following key words, phrases, or combinations as indicated:

1. 190307010
2. 799 W Riverside
3. 799 Riverside
4. frogtown AND encampment
5. riverside AND encampment
6. Tallman
7. Ami

As always I need these in EML or MBOX format along with all attachments in their native formats.

Thanks,

Adrian

# EXHIBIT L

**Subject:** Re: CPRA request (CD1.2020.02.26.a)  
**From:** Mel Ilomin <mel.ilomin@lacity.org>  
**Date:** 5/20/20, 1:49 PM  
**To:** adrian@123mail.org

Could you unabbreviate UHRC?

On Wed, Feb 26, 2020 at 6:59 PM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Good evening, Mel.

I'm looking for 2019 and 2020 emails in the possession of CD1's UHRC contact, sorry I don't know their name), that have any of the following key words, phrases, or combinations as indicated:

1. 190307010
2. 799 W Riverside
3. 799 Riverside
4. frogtown AND encampment
5. riverside AND encampment
6. Tallman
7. Ami

As always I need these in EML or MBOX format along with all attachments in their native formats.

Thanks,

Adrian

--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



**Subject:** Re: CPRA request (CD1.2020.02.26.a)  
**From:** adrian@123mail.org  
**Date:** 5/20/20, 1:51 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

You're asking me this after three months?

It's Unified Homelessness Response Center. They have a contact in each CD office who works with them to schedule encampment sweeps.

On Wed, May 20, 2020, at 1:49 PM, Mel Ilomin wrote:

Could you unabbreviate UHRC?

On Wed, Feb 26, 2020 at 6:59 PM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Good evening, Mel.

I'm looking for 2019 and 2020 emails in the possession of CD1's UHRC contact, sorry I don't know their name), that have any of the following key words, phrases, or combinations as indicated:

1. 190307010
2. 799 W Riverside
3. 799 Riverside
4. frogtown AND encampment
5. riverside AND encampment
6. Tallman
7. Ami

As always I need these in EML or MBOX format along with all attachments in their native formats.

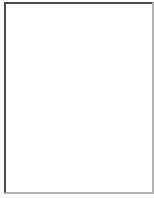
Thanks,

Adrian

--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**





# EXHIBIT M

**Subject:** Re: CPRA request (CD1.2020.02.26.a)  
**From:** adrian@123mail.org  
**Date:** 11/12/20, 3:45 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

Here's another one that seems to have dropped completely off your radar. Please produce soonest and also amend to be through November 12, 2020.

Thanks!

A.

On Wed, May 20, 2020, at 1:56 PM, Mel Ilomin wrote:

I'm never good with city speak and acronyms. Thank you.

On Wed, May 20, 2020 at 1:52 PM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

You're asking me this after three months?

It's Unified Homelessness Response Center. They have a contact in each CD office who works with them to schedule encampment sweeps.

On Wed, May 20, 2020, at 1:49 PM, Mel Ilomin wrote:

Could you unabbreviate UHRC?

On Wed, Feb 26, 2020 at 6:59 PM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Good evening, Mel.

I'm looking for 2019 and 2020 emails in the possession of CD1's UHRC contact, sorry I don't know their name), that have any of the following key words, phrases, or combinations as indicated:

1. 190307010
2. 799 W Riverside
3. 799 Riverside
4. frogtown AND encampment

5. riverside AND encampment
6. Tallman
7. Ami

As always I need these in EML or MBOX format along with all attachments in their native formats.

Thanks,

Adrian

--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



--

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



# EXHIBIT N

**Subject:** CPRA request (CD1.2020.03.02.a)  
**From:** adrian@123mail.org  
**Date:** 3/2/20, 4:23 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

I'd like to take a look at all emails in the possession of either Mr. Gubatan or Mr. Ricasa from January 1, 2017 through the very now which are either to/from/cc/bcc [matt.szabo@lacity.org](mailto:matt.szabo@lacity.org) OR which contain the word "szabo". It's probably sufficient just to search on the term "szabo" but I'm not familiar enough with Gmail to be absolutely sure. In any case, the following search string will definitely be sufficient:  
[matt.szabo@lacity.org](mailto:matt.szabo@lacity.org) OR szabo.

As always I need the emails in their native format as you've (and thanks for that) been supplying them along with all attachments in their respective native formats.

Thanks again for all your help,

Adrian

# EXHIBIT O

**Subject:** Re: CPRA request (CD1.2020.03.02.a)  
**From:** adrian@123mail.org  
**Date:** 5/20/20, 12:59 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

You haven't responded to this one yet although a response is more than two months overdue. Please advise.

A.

On Mon, Mar 2, 2020, at 4:23 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

I'd like to take a look at all emails in the possession of either Mr. Gubatan or Mr. Ricasa from January 1, 2017 through the very now which are either to/from/cc/bcc [matt.szabo@lacity.org](mailto:matt.szabo@lacity.org) OR which contain the word "szabo". It's probably sufficient just to search on the term "szabo" but I'm not familiar enough with Gmail to be absolutely sure. In any case, the following search string will definitely be sufficient: [matt.szabo@lacity.org](mailto:matt.szabo@lacity.org) OR szabo.

As always I need the emails in their native format as you've (and thanks for that) been supplying them along with all attachments in their respective native formats.

Thanks again for all your help,

Adrian



# EXHIBIT P

**Subject:** Re: CPRA request (CD1.2020.03.02.a)  
**From:** adrian@123mail.org  
**Date:** 11/12/20, 3:44 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

Please amend this request to be through November 12, 2020 and get the records to me as soon as possible. It's unconscionable that it's taking this long.

thanks!

A.

On Wed, May 20, 2020, at 12:59 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

You haven't responded to this one yet although a response is more than two months overdue. Please advise.

A.

On Mon, Mar 2, 2020, at 4:23 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

I'd like to take a look at all emails in the possession of either Mr. Gubatan or Mr. Ricasa from January 1, 2017 through the very now which are either to/from/cc/bcc [matt.szabo@lacity.org](mailto:matt.szabo@lacity.org) OR which contain the word "szabo". It's probably sufficient just to search on the term "szabo" but I'm not familiar enough with Gmail to be absolutely sure. In any case, the following search string will definitely be sufficient: [matt.szabo@lacity.org](mailto:matt.szabo@lacity.org) OR szabo.

As always I need the emails in their native format as you've (and thanks for that) been supplying them along with all attachments in their respective native formats.

Thanks again for all your help,

Adrian

# EXHIBIT Q

**Subject:** CPRA request (CD1.2020.03.02.b)  
**From:** adrian@123mail.org  
**Date:** 3/2/20, 4:50 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

I'd like to take a look at all emails in the possession of either Mr. Gubatan or Mr. Ricasa from January 1, 2017 through the very now which are to/from/cc/bcc which are to/from/cc/bcc any account at any of the listed domains:

- a. deaztlangroup.com
- b. psomas.com
- c. sheppardmullin.com

As always I need the emails in their native format as you've (and thanks for that) been supplying them along with all attachments in their respective native formats.

Thanks again for all your help,

Adrian

# EXHIBIT R

**Subject:** Re: CPRA request (CD1.2020.03.02.b)  
**From:** adrian@123mail.org  
**Date:** 5/20/20, 12:59 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

You have not yet responded to this although a response was due more than two months ago.

Thanks,

A.

On Mon, Mar 2, 2020, at 4:50 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

I'd like to take a look at all emails in the possession of either Mr. Gubatan or Mr. Ricasa from January 1, 2017 through the very now which are to/from/cc/bcc which are to/from/cc/bcc any account at any of the listed domains:

- a. deaztlangroup.com
- b. psomas.com
- c. sheppardmullin.com

As always I need the emails in their native format as you've (and thanks for that) been supplying them along with all attachments in their respective native formats.

Thanks again for all your help,

Adrian

# EXHIBIT S

**Subject:** Re: CPRA request (CD1.2020.03.02.b)  
**From:** adrian@123mail.org  
**Date:** 11/12/20, 3:43 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

You haven't yet responded to this. Please amend it to be through November 12, 2020 and get the records to me as soon as possible.

A.

On Wed, May 20, 2020, at 12:59 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

You have not yet responded to this although a response was due more than two months ago.

Thanks,

A.

On Mon, Mar 2, 2020, at 4:50 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

I'd like to take a look at all emails in the possession of either Mr. Gubatan or Mr. Ricasa from January 1, 2017 through the very now which are to/from/cc/bcc which are to/from/cc/bcc any account at any of the listed domains:

- a. deaztlangroup.com
- b. psomas.com
- c. sheppardmullin.com

As always I need the emails in their native format as you've (and thanks for that) been supplying them along with all attachments in their respective native formats.

Thanks again for all your help,

Adrian



# EXHIBIT T

**Subject:** Re: CPRA request (CD1.2020.03.02.b)  
**From:** adrian@123mail.org  
**Date:** 12/8/20, 7:58 AM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good morning, Mr. Ilomin,

What's up with this one? Please advise. Also make the end of the search interval December 8, 2020.

thanks!

A.

On Thu, Nov 12, 2020, at 3:43 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

You haven't yet responded to this. Please amend it to be through November 12, 2020 and get the records to me as soon as possible.

A.

On Wed, May 20, 2020, at 12:59 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

You have not yet responded to this although a response was due more than two months ago.

Thanks,

A.

On Mon, Mar 2, 2020, at 4:50 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

I'd like to take a look at all emails in the possession of either Mr. Gubatan or Mr. Ricasa from January 1, 2017 through the very now which are to/from/cc/bcc which are to/from/cc/bcc any account at any of the listed domains:

- a. deaztlangroup.com
- b. psomas.com
- c. sheppardmullin.com

As always I need the emails in their native format as you've (and thanks for that) been supplying them along with all attachments in their respective native formats.

Thanks again for all your help,

Adrian

# EXHIBIT U

**Subject:** Re: CPRA request (CD1.2020.03.02.b)  
**From:** Mel Ilomin <mel.ilomin@lacity.org>  
**Date:** 12/8/20, 9:19 AM  
**To:** adrian@123mail.org

I received your 3 requests. We have some highly controversial motions in Council this week. Could I get back to you Thursday since Tuesday and Wednesday this week are busy for me.

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



On Tue, Dec 8, 2020 at 7:58 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Good morning, Mr. Ilomin,

What's up with this one? Please advise. Also make the end of the search interval December 8, 2020.

thanks!

A.

On Thu, Nov 12, 2020, at 3:43 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> Good afternoon, Mel.

>

> You haven't yet responded to this. Please amend it to be through  
> November 12, 2020 and get the records to me as soon as possible.

>

> A.

>

> On Wed, May 20, 2020, at 12:59 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> > Good afternoon, Mel.

> >  
> > You have not yet responded to this although a response was due  
more  
> > than two months ago.  
> >  
> > Thanks,  
> >  
> > A.  
> >  
> > On Mon, Mar 2, 2020, at 4:50 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:  
> > > Good afternoon, Mel.  
> > >  
> > > I'd like to take a look at all emails in the possession of either Mr.  
> > > Gubatan or Mr. Ricasa from January 1, 2017 through the very  
now which  
> > > are to/from/cc/bcc which are to/from/cc/bcc any account at any  
of the  
> > > listed domains:  
> > >  
> > > a. [deaztlangroup.com](http://deaztlangroup.com)  
> > > b. [psomas.com](http://psomas.com)  
> > > c. [sheppardmullin.com](http://sheppardmullin.com)  
> > >  
> > > As always I need the emails in their native format as you've  
(and  
> > > thanks for that) been supplying them along with all attachments  
in  
> > > their respective native formats.  
> > >  
> > > Thanks again for all your help,  
> > >  
> > > Adrian

# EXHIBIT V

**Subject:** Re: CPRA request (CD1.2020.03.02.b)  
**From:** Mel Ilomin <mel.ilomin@lacity.org>  
**Date:** 1/25/21, 4:07 PM  
**To:** adrian@123mail.org

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



On Tue, Dec 8, 2020 at 10:55 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Why are you asking me? You've ignored it for nine months now without my permission. If you're so busy why didn't you ask ITA to do the search for you? They'll do it for any City office and it only takes a few months. We could have been done by June-ish.

On Tue, Dec 8, 2020, at 9:19 AM, Mel Ilomin wrote:

I received your 3 requests. We have some highly controversial motions in Council this week. Could I get back to you Thursday since Tuesday and Wednesday this week are busy for me.

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**





On Tue, Dec 8, 2020 at 7:58 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Good morning, Mr. Ilomin,

What's up with this one? Please advise. Also make the end of the search interval December 8, 2020.

thanks!

A.

On Thu, Nov 12, 2020, at 3:43 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> Good afternoon, Mel.

>

> You haven't yet responded to this. Please amend it to be through

> November 12, 2020 and get the records to me as soon as possible.

>

> A.

>

> On Wed, May 20, 2020, at 12:59 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> > Good afternoon, Mel.

> >

> > You have not yet responded to this although a response was due more

> > than two months ago.

> >

> > Thanks,

> >

> > A.

> >

> > On Mon, Mar 2, 2020, at 4:50 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> > > Good afternoon, Mel.

> > >

> > > I'd like to take a look at all emails in the possession of either Mr.

> > > Gubatan or Mr. Ricasa from January 1, 2017 through

the very now which  
> > > are to/from/cc/bcc which are to/from/cc/bcc any  
account at any of the  
> > > listed domains:  
> > >  
> > > a. [deaztlangroup.com](http://deaztlangroup.com)  
> > > b. [psomas.com](http://psomas.com)  
> > > c. [sheppardmullin.com](http://sheppardmullin.com)  
> > >  
> > > As always I need the emails in their native format  
as you've (and  
> > > thanks for that) been supplying them along with all  
attachments in  
> > > their respective native formats.  
> > >  
> > > Thanks again for all your help,  
> > >  
> > > Adrian

---

— Attachments: —

3cpa_.zip	709 KB
2cpa_.zip	476 KB
1cpa.zip	19.5 MB

# EXHIBIT W

**Subject:** Re: CPRA request (CD1.2020.03.02.b)  
**From:** adrian@123mail.org  
**Date:** 1/25/21, 4:12 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

What is this, Mel?

On Mon, Jan 25, 2021, at 4:07 PM, Mel Ilomin wrote:

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



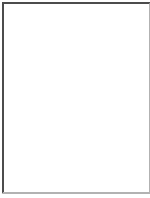
On Tue, Dec 8, 2020 at 10:55 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Why are you asking me? You've ignored it for nine months now without my permission. If you're so busy why didn't you ask ITA to do the search for you? They'll do it for any City office and it only takes a few months. We could have been done by June-ish.

On Tue, Dec 8, 2020, at 9:19 AM, Mel Ilomin wrote:

I received your 3 requests. We have some highly controversial motions in Council this week. Could I get back to you Thursday since Tuesday and Wednesday this week are busy for me.

**Mel Ilomin**  
**Senior Policy Deputy**  
**Office of Councilman Gil Cedillo**  
**Los Angeles Council District 1**  
**(213) 473-7001 City Hall**



On Tue, Dec 8, 2020 at 7:58 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Good morning, Mr. Ilomin,

What's up with this one? Please advise. Also make the end of the search interval December 8, 2020.

thanks!

A.

On Thu, Nov 12, 2020, at 3:43 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> Good afternoon, Mel.

>

> You haven't yet responded to this. Please amend it to be through

> November 12, 2020 and get the records to me as soon as possible.

>

> A.

>

> On Wed, May 20, 2020, at 12:59 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> > Good afternoon, Mel.

> >

> > You have not yet responded to this although a response was due more

> > than two months ago.

> >

> > Thanks,

> >

> > A.

> >

> > On Mon, Mar 2, 2020, at 4:50 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> > > Good afternoon, Mel.  
> > >  
> > > I'd like to take a look at all emails in the  
possession of either Mr.  
> > > Gubatan or Mr. Ricasa from January 1, 2017  
through the very now which  
> > > are to/from/cc/bcc which are to/from/cc/bcc any  
account at any of the  
> > > listed domains:  
> > >  
> > > a. [deaztlangroup.com](mailto:deaztlangroup.com)  
> > > b. [psomas.com](mailto:psomas.com)  
> > > c. [sheppardmullin.com](mailto:sheppardmullin.com)  
> > >  
> > > As always I need the emails in their native  
format as you've (and  
> > > thanks for that) been supplying them along with  
all attachments in  
> > > their respective native formats.  
> > >  
> > > Thanks again for all your help,  
> > >  
> > > Adrian

**Attachments:**

- 3cpa.zip
- 2cpa.zip
- 1cpa.zip

# EXHIBIT X

**Subject:** CPRA request (CD1.2020.11.12.a)  
**From:** adrian@123mail.org  
**Date:** 11/12/20, 4:01 PM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good afternoon, Mel.

Today I am looking for emails in the possession of Mr. Gubatan dated between August 1, 2020 and November 12, 2020 which meet ANY of the following criteria:

A. Are to/from/cc/bcc any of the following email accounts OR domains:

1. nussbaumapc.com
2. deaztlangroup.com
3. psomas.com
4. sandstoneproperties.com

OR

B. which contain ANY of the following words or phrases:

1. Botz
2. Hillside
3. 1130
4. "eminent domain"

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Or alternatively in EML format, which you've sent before and is perfectly more than acceptable.

Thanks for your help, Mr. Ilomin.

Adrian



# EXHIBIT Y

**Subject:** Re: CPRA request (CD1.2020.11.12.a)  
**From:** adrian@123mail.org  
**Date:** 12/8/20, 7:56 AM  
**To:** "Mel Ilomin" <mel.ilomin@lacity.org>

Good morning, Mr. Ilomin.

This request is over a month old and yet no response from you. Please amend the search interval to end on December 8, 2020.

thanks!

A.

On Thu, Nov 12, 2020, at 4:01 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Good afternoon, Mel.

Today I am looking for emails in the possession of Mr. Gubatan dated between August 1, 2020 and November 12, 2020 which meet ANY of the following criteria:

A. Are to/from/cc/bcc any of the following email accounts OR domains:

1. nussbaumapc.com
2. deaztlangroup.com
3. psomas.com
4. sandstoneproperties.com

OR

B. which contain ANY of the following words or phrases:

1. Botz
2. Hillside
3. 1130
4. "eminent domain"

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Or alternatively in EML format, which you've sent before and is perfectly more than acceptable.

Thanks for your help, Mr. Ilomin.

Adrian